

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION**

**MICHAEL W. RONDINI and)
CYNTHIA M. RONDINI, as the)
surviving parents of MEGAN)
ELIZABETH RONDINI, their)
deceased child, MICHAEL W.)
RONDINI, as Administrator and)
Personal Representative for the)
Estate of MEGAN ELIZABETH)
RONDINI, deceased,)**

Plaintiffs,

vs.

TERRY J. BUNN, JR.

Defendant.

**CASE NUMBER
7:17-cv-01114-TMP**

JOINT MOTION FOR LIMITED EXTENSION OF DEADLINES

COME NOW the parties, Michael W. Rondini, as Plaintiff, and Terry J. Bunn, Jr., as Defendant, by and through their respective counsel and hereby request the Court to grant a limited extension of the deadlines set forth in the Court's Scheduling Order of June 14, 2018. As grounds therefor, the parties would submit the following:

1. This Court's Scheduling Order of June 14, 2018 contained the following deadlines which the parties would like to extend for twenty-one (21) days:

April 1, 2019 – discovery cutoff
(the parties would like to extend this to April 22, 2019);

February 11, 2019 – report due from Defendant’s expert
(the parties would like to extend this to March 4, 2019);

May 1, 2019 – dispositive motions
(the parties would like to extend this to May 22, 2019);

March 15, 2019 - date for parties to object for referral to mediation
(the parties would like to extend this to April 5, 2019);

October, 2019 – trial readiness
(the parties do not believe that this limited extension
will delay the trial readiness of this case).

2. The parties respectfully submit that this request for a limited extension arose due to personal and professional interruptions to counsels’ schedules as well as the delay in deposing the Plaintiffs due to health issues. The Plaintiff’s production of documents has largely centered around the decedent’s cell phone text messages which has been quite voluminous and extensive. Defendant’s expert is in need of the requested extension to complete her analysis of same. as a result, Defendant’s counsel has agreed with Plaintiff’s counsel that all deadlines should be correspondingly extended.

3. The parties respectfully submit that this short extension is not counter to the interests of judicial economy nor should it unduly adversely affect the Court’s schedule. Conversely, the parties would submit that they would be caused undue prejudice should this limited extension not be granted.

WHEREFORE, PREMISES CONSIDERED, the parties respectfully request the Court to grant this extension and to enter any and all such Orders consistent therewith and in furtherance thereof.

Respectfully submitted,

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